

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

BERNARDO SANCHEZ,

Plaintiff,

vs.

ROSEN P. TRAYKOV, and  
TRANSWOOD LOGISTICS, INC.,

Defendants.

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Case No.

**JURY TRIAL DEMANDED**

**NOTICE OF REMOVAL**

COMES NOW Defendant, Transwood Logistics, Inc., by and through its attorneys, Roberts Perryman, P.C., and hereby files its Notice of Removal stating the following:

**INTRODUCTION**

1. A civil action has been commenced and is now pending the Circuit Court of St. Louis County, State of Missouri, Case No. 20SL-CC04338, wherein Bernardo Sanchez is the Plaintiff and Rosen P. Traykov and Transwood Logistics, Inc. are the Defendants.

2. This action is a civil action wherein Plaintiff has made claims for damages as a result of Defendants' alleged negligence in connection with a motor vehicle accident that allegedly occurred on September 10, 2018.

3. Defendant Transwood Logistics, Inc. has been served with Plaintiff's Petition and consents to removal.

4. Defendant Rosen P. Traykov has not been served with Plaintiff's Petition but consents to removal.

**DIVERSITY OF CITIZENSHIP EXISTS**

5. This action is a civil action, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441, and this is a civil action proceeding involving diversity of citizenship.

6. Plaintiff Bernardo Sanchez is a citizen of the State of Missouri.

7. Defendant Transwood Logistics, Inc. is a Nebraska corporation with its principal place of business in Nebraska.

8. Defendant Rosen P. Traykov is a citizen of the State of Texas.

9. Therefore, there is complete diversity between the parties.

**THE AMOUNT IN CONTROVERSY HAS BEEN SATISFIED**

10. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs. This is a personal injury action where Plaintiff has claimed to have suffered serious injuries, including injuries to his back. Plaintiff claims to have sustained damages for medical bills and costs related to medical treatment for his injuries, and claims he will sustain future damages for medical bills and costs relating to the medical treatment for his injuries. Because this is a personal injury action where Plaintiffs claim damages related to alleged serious personal injuries, past and future medical treatment, the amount in controversy requirement is satisfied.

**NOTICE OF REMOVAL IS TIMELY**

11. Less than thirty (30) days have elapsed since receipt of said initial pleadings by Defendant Transwood Logistics, Inc.

12. Defendant files herewith a copy of all process, pleadings, and order served upon it in this action. See *Exhibit A*.

WHEREFORE, Defendant Transwood Logistics, Inc. prays the Court to accept its Notice for Removal and make and enter such orders as may be necessary to complete removal of this action from the Circuit Court of St. Louis County, State of Missouri, to the United States District Court for the Eastern District of Missouri, and that further proceedings be discontinued in the State Court and all future proceedings be held in this Court, as the laws in such case provide.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

/s/ Ted L. Perryman

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been filed upon the Court's electronic filing system this 10th day of February, 2021 to:

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/s/ Ted L. Perryman